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October 27, 2015

### By ECF

Hon. Vera M. Scanlon  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Joint status letter  
W.S. Molnar Co. v. Global Metals Corporation, et al.,  
1:14-cv-04461-MKB-VMS**

Dear Judge Scanlon:

This firm is counsel to plaintiff. In accordance with your order dated October 13, 2015 and on behalf of all parties, we write to notify you of the status of discovery and mediation in this action.

(1) A mediation date has not been set. Plaintiff attempted, on numerous occasions, to schedule mediation however, defendant Global Metals Corporation has not confirmed its availability. We request the Court order Global to identify available dates, by or before November 6, 2015, giving substitute counsel for Global one week to advise the parties of its client's availability;

(2) Depending on Global's response, the parties wish to continue to hold off on additional discovery until mediation can be scheduled; and

(3) Defendants Allegheny Casualty Company and Triton Structural Concrete, Inc. have requested particularization of plaintiff's costs and pricing. Plaintiff will make such efforts to provide such particularization by or before November 14, 2015.

Very truly yours,

Rebecca L. Klebanoff